

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case Number: 14-CR-27-F
)	
GLORIA JEAN REEDER,)	
)	
Defendant.)	

GLORIA REEDER'S RESPONSE TO COURT'S ORDER TO SHOW CAUSE WHY PAUL MODELESKI SHOULD NOT BE SEVERED FROM TRIAL
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On behalf of Defendant Gloria Jean Reeder, the undersigned provides the following response and objection to severing Paul Modeleski from the trial in this matter:

1. At this juncture, Ms. Reeder believes that the presence of Paul Modeleski is critical to her defense in this matter and particularly her defense to Count 2, Obstruction of Justice.

2. To the extent that the Court is asking that Mr. Modeleski be severed due to his current unavailability for trial, counsel wishes to inform the court that because of the voluminous discovery provided in this case, counsel for Ms. Reeder cannot be adequately prepared for trial on the date currently set and in fact, will require a number of months to review the discovery and obtain additional information that is critical to her Defense.

3. It appears that this matter should be declared complex and that the Court needs to meet with all counsel to determine when the parties can be ready for trial.

4. Ms. Reeder specifically reserves the right to change her position regarding Mr. Modeleski as the review of evidence and other information becomes available.

WHEREFORE, Gloria Jean Reeder asks that this Court not sever Defendant Modeleski from these proceedings at this time.

DATED this 5th day of September, 2014.

WOODHOUSE RODEN NETHERCOTT, LLC

/s/ Gay Woodhouse

Gay Woodhouse
1912 Capitol Avenue, Suite 500
Cheyenne, Wyoming 82001
307/432-9399
Attorney for Defendant Gloria Reeder

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2014 a true and correct copy of the foregoing was served by *electronic delivery* to:

U.S. Attorney's Office
2120 Capitol Ave. Room 4002
Cheyenne, WY 82001
307-772-2124

/s/ Gay Woodhouse
